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March 30, 2022

The Honorable Philip M. Halpern  
District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601-4154

Re: United States v. Francis Hughes  
21-cr-00584(PMH)

Dear Honorable Halpern:

I am writing on behalf of Francis Hughes to ask that Your Honor please adjourn the conference that is currently scheduled for April 5, 2022. As background, I have been in ongoing plea discussions with the Government and, as part of that process, I have asked to view certain discovery that is in the Government's possession. The Government has agreed to such a viewing, but our schedules have not yet made that possible.<sup>1</sup> As such, I ask that Mr. Hughes' conference be adjourned to a date in early May.

I have spoken to AUSA Marcia Cohen, and she does not object to this request. If this application is granted, I ask that time be exclude under the Speedy Trial Act.

Thank you for your consideration.

Sincerely,

//s

Benjamin Gold  
Assistant Federal Defender

cc: AUSA Marcia Cohen

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<sup>1</sup> Part of the scheduling difficulty is that I would like to bring a digital forensic expert with me to this viewing, so it requires balancing multiple schedules.